

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

M. DIANE KOKEN, in her official capacity as)	
Insurance Commissioner of the Commonwealth)	C.A. No. 07-048-JJF
of Pennsylvania, as Liquidator of RELIANCE)	
INSURANCE COMPANY (IN)	
LIQUIDATION),)	
)	
Plaintiff,)	
)	
v.)	
)	
PAULA FINANCIAL,)	
)	
Defendant.)	

**STIPULATED MOTION TO EXTEND DEADLINE
TO ANSWER OR OTHERWISE RESPOND**

Plaintiff M. Diane Koken, in her official capacity as Insurance Commissioner of the Commonwealth of Pennsylvania, as Liquidator of Reliance Insurance Company (In Liquidation), and Defendant Paula Financial, by and through their undersigned counsel, hereby stipulate to extend the time in which Defendant has to answer or otherwise respond to the Complaint. Plaintiff filed the instant action on January 26, 2007 and served Defendant that same date. The parties stipulate to extend Defendant's time to answer or otherwise respond to Plaintiff's complaint until February 23, 2007. Neither party will be prejudiced by this extension.

A proposed order is attached for the Court's convenience.

WHEREFORE, the parties request this Court grant Defendant until February 23, 2007 to answer or otherwise respond to the complaint.

Respectfully submitted this 15th Day of February, 2007,

/s/ Chad M. Shandler

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ATTORNEYS FOR PLAINTIFF

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of Pennsylvania, as Liquidator of RELIANCE)	
INSURANCE COMPANY (IN)	
LIQUIDATION),)	
)	
Plaintiff,)	
)	
v.)	
)	
PAULA FINANCIAL,)	
)	
Defendant)	

[PROPOSED] ORDER

UPON CONSIDERATION of the parties' Stipulated Motion to Extend Defendant's Deadline to Answer or Otherwise Respond Until February 23, 2007, and there being no prejudice to either party, the parties' motion is hereby GRANTED. Defendant must answer or otherwise respond to the complaint on or before February 23, 2007.

IT IS SO ORDERED.

Dated: _____

United States District Court Judge